

# WOLFF & SAMSON

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW

5 BECKER FARM ROAD

ROSELAND, NEW JERSEY 07068-1776

973-740-0500

TELECOPIER: 973-740-1407

HACKENSACK OFFICE:

58-60 MAIN STREET

P.O. BOX 157

HACKENSACK, NEW JERSEY 07602

201-488-3338

TELECOPIER: 201-488-4164

NEW YORK OFFICE:

140 BROADWAY

FORTY-SIXTH FLOOR

NEW YORK, NEW YORK 10005

212-973-0572

WRITER'S E-MAIL:

SWEINER@WOLFFSAMSON.COM

WRITER'S DIRECT DIAL:

973-533-6554

WRITER'S TELECOPIER:

973-740-1407

DAVID SAMSON\*  
RONALD E. WISS  
ARTHUR S. GOLDSTEIN\*  
ARMEN SHAHINIAN\*  
MARTIN L. WIENER\*  
GAGE ANDRETTA\*  
DANIEL A. SCHWARTZ\*  
KAREN L. GILMAN  
KENNETH N. LAPTOOK\*  
DAVID L. SCHLOSSBERG  
PAUL M. COLWELL  
ROBERT E. NIES  
MORRIS BIENENFELD\*  
DENNIS M. TOFT  
JEFFREY M. GUSOFF\*  
JOSEPH A. FERRIERO\*\*

M. JEREMY OSTOW  
JEFFREY M. DAVIS  
JOHN F. CASEY  
JAMES D. FERRUCCI  
JOHN M. SIMON  
LAURENCE M. SMITH  
WILLIAM E. GOYDAN\*  
DARRYL WEISSMAN\*  
  
JOEL A. WOLFF  
ROGER J. BREENE  
CARL B. LEVY  
DANIEL C. BECKER\*  
HOWARD J. MENAKER  
ANGELO A. MASTRANGELO  
OF COUNSEL

\*MEMBER N.J. AND N.Y. BARS  
\*\*CERTIFIED CIVIL TRIAL ATTORNEY

AARON D. BASSAN  
ROXANNA E. HAMMETT  
LAUREN M. O'SULLIVAN  
ROBERT L. TCHACK  
JOSEPH ZAWILA  
STEPHEN H. BIER\*  
MARY JANE DOBBS

SENIOR ATTORNEYS

JAMES J. ROSS  
ROBERT M. SILVERSTEIN\*  
HOWARD K. UNIMAN  
MICHELLE A. SCHAAP  
LORI E. GRIFA\*  
THOMAS W. SABINO  
CATHERINE P. WELLS  
MYRNA BLUME\*  
MARK R. MICUCCI  
FRANK J. KONTELY III  
ADAM P. FRIEDMAN\*  
JONATHAN S. BONDY\*  
ARNOLD F. MASCALI\*

ADAM K. DERMAN  
MARTIN L. BOROSKO  
ANDREW S. KENT\*  
ERIC J. LEVINE\*  
DOUGLAS M. COHEN\*  
ANDREW SAMSON  
JORDAN S. SOLOMON\*  
MITCHELL L. PASCUAL\*  
SCOTT D. BARON  
DAVID J. SPRONG  
SHARON L. WEINER  
VANESSA JACHZEL\*  
DORIT F. KRESSEL\*  
JEFFREY B. ULIN\*  
ARTHUR M. NALBANDIAN\*  
SUSAN GREENWALD  
JUNIE HAHN  
MICHELE S. KAYNE\*  
STACY KRIEGER\*  
JOHN O. LUKANSKI\*  
MARCI DIFRANCESCO  
NOREEN M. GIBLIN

PLEASE REPLY TO ROSELAND

October 26, 1999

Muthu Sundram, Esq.  
Assistant Regional Counsel  
Office of Regional Counsel  
US Environmental Protection Agency - Region II  
290 Broadway, 17<sup>th</sup> Floor  
New York, NY 10007

Re: LCP Chemicals Site, Linden, New Jersey  
EPA Order Index No. II-CERCLA-02-99-2015

Dear Muthu:

Enclosed is an Access Order which was signed by Judge Weiss giving ISP and its authorized contractors access to the LCP site.

Paragraph 25 of the Consent Order requires ISP to submit a work plan for the performance of the RI/FS within 30 days of ISP gaining access to the site. Pursuant to my conversation with Patricia Simmons, this 30 day period will commence on October 25, 1999. Therefore, ISP will submit the RI/FS Work Plan on or before November 22, 1999.

Pursuant to the Court Order as well as the Access Agreement with Active Water Jet, ISP's contractor will notify Active Water Jet prior to coming onto the site.

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OCT 28 1999

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**WOLFF & SAMSON**

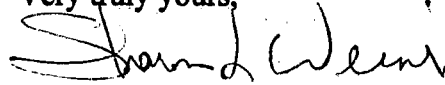
• Muthu Sundram, Esq.

October 26, 1999

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Please feel free to contact me if you require any additional information.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Sharon L. Weiner".

SHARON L. WEINER

SLW:jmc

Enclosure

cc: Patricia Simmons (w/encl.)  
Carrie McGowan (w/encl.)  
Tom Piscotta (w/encl.)

**FILED**

**OCT 22 1999**

**LAWRENCE WEISS  
J.S.C.**

**WOLFF & SAMSON  
A PROFESSIONAL CORPORATION  
5 BECKER FARM ROAD  
ROSELAND, NEW JERSEY 07068-1776  
(973) 740-0500  
Attorneys for Plaintiff  
ISP Environmental Services, Inc.**

**ISP Environmental Services, Inc. a  
Delaware Corporation,**

**Plaintiff,**

**vs.**

**HANLIN GROUP, INC. and LCP  
CHEMICALS, INC.,**

**Defendants.**

**SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: UNION COUNTY**

**DOCKET NO.**

**Civil Action**

**ACCESS ORDER  
PURSUANT TO N.J.S.A. 58:10B-16**

THIS MATTER having been opened to the Court by Wolff & Samson, P.A., attorneys for plaintiff ISP Environmental Services, Inc. ("ISP") upon notice to defendants Hanlin Group, Inc. and LCP Chemicals, Inc. (collectively, "Defendants") seeking the issuance of an access order for remediation purposes pursuant to N.J.S.A. 58:10B-16, and the Court having considered the papers submitted by the parties, and the arguments of counsel, and having determined that the showing has been made under N.J.S.A. 58:10B-16(b) that access to the subject property is reasonable and necessary to remediate contamination, and for good cause shown;

IT IS on this 22 day of October, 1999;

ORDERED that ISP and its authorized contractors are hereby granted access to the real property located off at South Wood Avenue on the Tremley Peninsula in Linden,

New Jersey, known as the LCP Chemicals, Inc. Superfund Site (the "Property") under the following conditions:

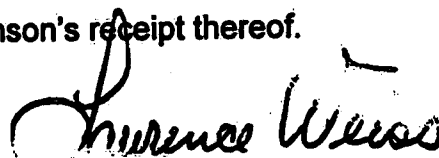
1. ISP and its authorized contractors shall enter the Property to conduct all activities necessary to complete the Remedial Investigation/Feasibility Study required by the Administrative Consent Order entered into in May 1999 between ISP and the United States Environmental Protection Agency regarding the Property.

2. ISP and its authorized contractors will give the current tenant, Active Water Jet, advance notice of the dates on which ISP or its contractor plans to enter the Property for the purposes of performing the work contemplated by this Order.

3. Pursuant to N.J.S.A. 58:10B-16(a)(2)(c), ISP will take all reasonable measures to minimize disruption to the Property.

4. Pursuant to N.J.S.A. 58:10B-16(a)(2)(c), ISP will take all reasonable measures to return the Property to its condition prior to the commencement of the monitoring well installation.

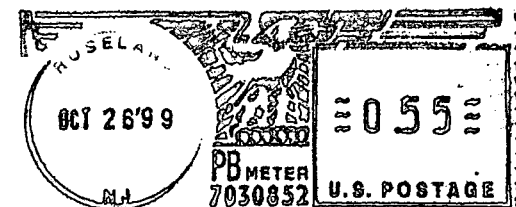
IT IS FURTHER ORDERED that counsel for ISP shall provide a copy of this order upon the last known address of the registered agents of Defendants, upon their bankruptcy counsel Lisa S. Bonsall, Esq., and the Secretary of State of the State of New Jersey within seven (7) days of Wolff & Samson's receipt thereof.



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HONORABLE LAWRENCE WEISS, J.S.C.

**WOLFF & SAMSON**  
A PROFESSIONAL CORPORATION  
COUNSELLORS AT LAW  
280 CORPORATE CENTER  
5 BECKER FARM ROAD  
ROSELAND, NEW JERSEY 07068-1776



Muthu Sundram, Esq.  
Assistant Regional Counsel  
Office of Regional Counsel  
US Environmental Protection Agency - Region  
II  
290 Broadway, 17<sup>th</sup> Floor  
New York, NY 10007